



EXTERNAL PRIVACY POLICY

ECSScore



Company Name	ECS-Score Private Limited
Document Title	External Privacy Policy
Legal Compliance	Digital Personal Data Protection Act, 2023 (DPDP Act) Information Technology Act, 2000/ 2008 (IT Act) Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (SPDI Rules – transitional relevance)
Version	1
Effective Date	_____
Last Updated	_____
Registered Office Address	_____ _____
Website	https://www.ecsscore.com
Official Contact Email	ecsscore@gmail.com
Designated Grievance Officer (DPDP Requirement)	<u>Name:</u> _____ <u>Email:</u> ecsscore@gmail.com
Authorized Signatory	Name: _____ Designation: _____ Signature: _____
Document Issued By	ECS-Score Private Limited

ECS- Aligned with ISO 27001:2022 Requirements

ISO 27001:2022 Clause	Requirement Summary	ECS-Score Compliance Measures
Clause 4 – Context of the Organization	Determine internal/external issues, stakeholders, ISMS scope	Scope defined; stakeholders mapped; data fiduciary role documented.

Clause 5 – Leadership	Leadership commitment, policy, roles, responsibilities	Management approves ISMS, Privacy Policy, Consent Policy; Grievance Officer assigned.
Clause 6 – Planning	Address risks and opportunities; information security objectives	Risk assessment & treatment plan includes personal data protection; ISMS objectives set.
Clause 7 – Support	Resources, competence, awareness, communication, documentation	Staff trained in data privacy & ISMS; internal communication maintained; policies documented.
Clause 8 – Operation	Operational planning & control, risk treatment implementation	Policies, procedures, workflows for consent, verification, data processing, incident response implemented.
Clause 9 – Performance Evaluation	Monitoring, measurement, analysis, internal audit, management review	Periodic internal audits, metrics tracking, management review meetings conducted.
Clause 10 – Improvement	Nonconformity & corrective action, continual improvement	Corrective actions tracked; ISMS updated continuously; lessons learned applied.

ESC – Follows DPDP Act 2023 Guidelines

DPDP Act Section	Requirement Summary	ECS-Score Compliance Measures
Section 3	Definitions (Data Fiduciary, Data Principal, Sensitive Personal Data)	ECS-Score identifies roles, scope, and classification of personal data.
Section 5	Processing personal data only after consent or legal basis	Consent Management Policy implemented; explicit consent obtained before data processing.
Section 6	Notice requirements for collection of data	Privacy Policy & Consent Policy published; notice given at collection points.
Section 7	Right to withdraw consent	Users can withdraw consent anytime via account settings, email, or grievance officer.
Section 8	Duties of Data Fiduciary (security safeguards, privacy by design)	ISMS policies implemented; technical, administrative, physical controls aligned to ISO 27001.
Section 9	Data breach and security obligations	Incident Response Plan in place; breach notifications managed as per timelines.
Section 10	Right to access personal data	Users can request access to their data via profile settings or grievance officer.
Section 11	Right to correct or erase personal data	Users can request correction or deletion; implemented through internal workflows.
Section 12	Purpose limitation	Data is only processed for explicitly stated purposes; no unauthorized sharing.

Section 13	Data fiduciary obligations on third parties (processors)	DPA's with vendors, employer dashboards; third-party compliance enforced.
Section 14	Grievance redressal mechanism	Designated Grievance Officer appointed; complaints tracked and resolved timely.
Section 15	Special provisions for sensitive personal data	Classified and protected as per internal policy; processed only after explicit consent.
Section 16	Retention and anonymization/deletion	Data retention periods defined; data anonymized or deleted after retention ends.
Section 17	Transparency and accountability	Policies, notices, consent logs, and audit trails maintained; ISO 27001 aligned.

At **ECS-Score** your trust is our foundation. We understand that the information you share with us forms an essential part of your professional identity, and protecting it is our highest priority.

This External Information Security & Data Protection Policy explains how we collect, use, safeguard, and manage your personal and employment information in accordance with globally recognized standards such as **ISO/IEC 27001:2022** and India's **Digital Personal Data Protection (DPDP) Act, 2023**. It reflects our dedication to maintaining transparent, lawful, and robust practices to protect the data entrusted to us by our users, clients, and partners.

1. Purpose

This policy defines the principles and practices followed by **ECS-Score** to ensure the secure and lawful processing of personal, sensitive, and employment information. It demonstrates our compliance with:

- **ISO/IEC 27001:2022 Information Security Management System (ISMS)**
- **DPDP Act, 2023 (India)**

The purpose is to assure all external stakeholders that their data is protected with the highest standards of security and privacy.

2. Scope

This policy applies to:

- All users creating ECS-Score profiles
- Employers, recruiters, and verification partners
- Visitors interacting with our website, app, or APIs
- All personal and employment data collected and processed
- All systems storing, transmitting, or analyzing user data

This policy protects anyone who interacts with us or provides us with their information.

3. Data Protection Principles

We operate under the following principles:

3.1 Lawful and Consent-Based Processing

We collect data only with clear, informed consent. Users may withdraw consent at any time.

3.2 Purpose Limitation

Data is collected only for specific, clearly stated purposes such as employment verification, identity validation, and ECS-Score generation.

3.3 Data Minimization

We collect only the minimum data necessary to provide our services.

3.4 Accuracy

We maintain accurate information and allow users to correct incorrect or outdated data.

3.5 Storage Limitation

Data is retained only as long as required for its intended purpose or as mandated by law.

3.6 Data Security

We implement ISO 27001 controls such as encryption, access restrictions, multi-factor authentication, monitoring, and secure development practices.

3.7 Transparency

We clearly communicate how data is collected, used, shared, and retained.

4. Categories of Data We Collect

4.1 Personal Data

- Name, email, phone number, gender, DOB
- Identity documents such as PAN or Aadhaar (optional)

4.2 Employment Data

- Previous and current employment information
- Offer letters, relieving letters, experience letters
- Salary data (optional)
- Peer/manager feedback
- Educational documents (optional)

4.3 Technical Data

- IP address
- Device fingerprint
- Access logs
- Geolocation (if allowed)

5. How We Use Your Data

We process data to:

- Create ECS-Score credibility reports
- Verify identity and employment history
- Share verified scores with employers (with your consent)
- Detect fraud and unwanted activities
- Enhance platform performance
- Provide customer support
- Maintain analytics (anonymized)

6. Data Sharing & Third Parties

We share data only when necessary and always with legal basis or user consent.

We may share information with:

- **Employers** – for candidate evaluation

- **Background verification partners**
- **Cloud hosting providers** (ISO-certified)
- **Legal/regulatory authorities** when required

We **never** sell personal data.

7. Data Storage & Security Controls (ISO 27001 Compliance)

We follow strict ISO 27001:2022 standards and controls, including:

Technical Security

- Data encryption (AES-256 and TLS 1.3)
- Secure coding (OWASP Top 10)
- Secure APIs and authentication
- Continuous security monitoring

Administrative Security

- Employee background checks
- Mandatory security training
- Role-based access control (RBAC)

Operational Security

- Event logging and audit trails
- Vulnerability management
- Backup & disaster recovery

Physical Security

- Restricted data center access
- CCTV monitoring
- Secure entry controls

8. User Rights (DPDP Act, 2023)

Users have the right to:

- Access their personal data
- Request correction or updates

- Withdraw consent
- Request data deletion
- Know how data is processed
- Seek grievance redressal

Requests can be submitted to our Grievance Officer.

9. Cross-Border Data Transfer

Data is primarily stored in India.

If transferred or backed up abroad:

- The destination must have adequate safeguards
- A lawful contractual requirement must exist

We ensure compliance with all DPDP and international transfer rules.

10. Data Breach Notification

If a data breach occurs:

- Users will be notified promptly
- The Data Protection Board may be informed
- Root cause analysis and corrective actions will be taken
- Measures will be implemented to prevent recurrence

11. Children's Data

We do not process the data of individuals under **18 years**.

Any such data found will be deleted immediately.

12. Cookies & Tracking Technologies

We use cookies for:

- Login/authentication
- User preference storage

- Analytics and performance

Users may manage or restrict cookies at any time.

13. Grievance Officer (DPDP Requirement)

Name: *[To be filled]*

Email: *grievance@company.com*

Phone: *[Insert]*

Address: *Registered office location*

All grievances will be addressed within legal timelines.

14. Compliance & Audit

We perform:

- Annual internal ISMS audits
- External audits (as applicable)
- Data protection compliance checks
- Vendor and supplier audits
- Periodic risk assessments

This ensures continuous improvement and strong governance.

15. Policy Review

This policy is reviewed:

- Annually
- After major regulatory changes
- After significant security incidents
- When new technologies are adopted

Updated versions will be communicated publicly.

ECS-Score remains committed to safeguarding all personal and employment-related information entrusted to us. We will continue to strengthen our security posture, improve privacy practices, and ensure full compliance with ISO/IEC 27001:2022 and the DPDP Act, 2023.

Your trust is invaluable to us, and we thank you for choosing our platform. For any questions or concerns regarding this policy, you are encouraged to contact our Grievance Officer or support team.

